

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

GOVERNMENT'S MOTION FOR DETENTION

The United States, by and through its attorney, Christina E. Nolan, United States Attorney for the District of Vermont, moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. §§ 3142(e) and (f).

1. Eligibility for Detention.

This defendant is eligible for detention because he has been charged with illegal possession of a firearm. *See* 18 U.S.C. § 3142(f)(1)(E).

2. Reason For Detention.

The Court should detain the defendant because there are no conditions of release which will reasonably assure the safety of the community or the appearance of the defendant for further proceedings in this matter. The defendant has a history of illegal drug use. During processing with the Probation Office today, the defendant tested positive for cocaine, THC, and buprenorphine. The Pretrial Services Officer advises that the defendant does not have a prescription for buprenorphine. At the time of his arrest this morning, law enforcement recovered Suboxone and what appeared to be a pipe used to smoke an unidentified substance. The defendant's drug use, coupled with the fact that law enforcement has not recovered the

shotgun he has been charged with illegally possessing, present serious risks to the safety of the community.

In addition, the Pretrial Services Officer has identified numerous failures to appear in previous cases on the defendant's record. This history of failing to follow court orders strongly suggests that he would not comply with conditions set by this Court.

3. Time For Detention Hearing.

It is the government's understanding that the Pretrial Services Officer requires additional time to investigate the defendant's substance abuse issues before making a recommendation as to detention or release. Therefore, the government requests a three-day continuance pursuant to 18 U.S.C. § 3142(f)(2).

Dated at Burlington, in the District of Vermont, April 26, 2019.

Respectfully submitted,

UNITED STATES OF AMERICA

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